ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 95-116
Telephone Number Portability	)	RM 8535

COMMENTS OF BELL ATLANTIC

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I. Introduction and Summary

Bell Atlantic agrees that the Commission should take a leadership role in developing a uniform national policy regarding number portability. However, it would be premature for the Commission to require industry to take immediate steps to ***implement*** a long-term solution. The Commission should instead give industry bodies sufficient time to conduct a thorough assessment of the proposed long-term solutions, recommend one for implementation if the costs of implementation are outweighed by the benefits, and identify the network modifications required to support implementation. The Commission should also work with the industry and vendors to develop meaningful empirical data concerning demand for different forms of number portability and the probable costs of the solutions that have been proposed. The reasons for approaching these issues in a deliberate manner are clear.

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[1] The Bell Atlantic telephone companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc., Bell Atlantic-Maryland, Inc., Bell Atlantic-New Jersey, Inc., Bell Atlantic-Pennsylvania, Inc., Bell Atlantic-Virginia, Inc., Bell Atlantic-Washington, D.C., and Bell Atlantic-West Virginia, Inc.

First, the early indications are that existing "interim" measures for service provider portability are sufficient in the near term to allow competition to proceed. These measures are practical, transparent to the customer, and more flexible than the Commission may fully appreciate. Their ready availability at reasonable prices means that the Commission and the industry need not rush headlong to embrace very expensive "solutions" without appropriate study.

Second, all of the long-term measures discussed in the Notice of Proposed Rulemaking[2] present serious technical challenges and would require substantial network modifications and associated expenditures. Yet, there is virtually no data to show how much rates for telecommunications services would have to be increased to pay for a long-term portability solution or whether consumers would be willing to pay those rates. Until a cost/benefit analysis is performed, it should not be merely ***assumed*** that implementation of one of the long-term solutions would increase consumer welfare.

Third, the Commission should recognize the possibility that none of the presently proposed long-term solutions will evolve into an acceptable long-term solution For example, the MCI Metro proposal would accelerate exhaustion of the telephone numbering resource and suffers from other fundamental defects. The proposals developed by AT&T and U.S. Intelco show somewhat greater promise

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[2] Notice of Proposed Rulemaking, ***Telephone Number Portability***, CC Docket No. 95-116 (rel. July 13 1995) ("NPRM" or "Notice").

but nonetheless present serious unresolved questions. These include the extent of the modifications to service provider networks that would be required to implement those solutions and the estimated costs of making such modifications. There is also a major issue as to whether competitive neutrality can be ensured with any of the proposed long-term solutions.

For these reasons, the Commission should refer issues concerning long-term measures to a special task force of the Alliance for Telecommunications Industry Solutions ("ATIS") and require a final report from the task force within a reasonable period of time, perhaps 18 months. ATIS should be tasked with building on the work begun by the Number Portability Workshop of the Industry Numbering Committee ("INC"), collecting relevant empirical data concerning actual consumer demand and effects on competition as interim measures are utilized, and definitively resolving the technical questions that should be answered before, rather than during, an implementation effort. The industry simply is not in a position to answer those questions based on existing data.

In the meantime, the Commission should encourage further *voluntary* development of interim and long-term measures. The Commission also should clearly articulate requirements that any solution adhere to strict competitive neutrality and receive fair contributions from the cost-causers who benefit from them.

II. Interim Measures Satisfy the Current Need for Service Provider Number Portability

Reasonable measures to provide number portability are available today and are the subject of ongoing negotiations or proceedings in a number of fora. While these interim measures may not be ideal in all respects, they represent an appropriate balance between the policy objective of increasing competition and the common sense objective of not mandating implementation of elaborate projects that are only partially-conceived and of uncertain consumer benefit. Affording industry a reasonable opportunity to generate empirical data based on these interim measures is the most sensible course for the Commission in the near term. The Commission should task an appropriate industry body, preferably ATIS, with responsibility for gathering relevant empirical evidence as interim solutions are implemented.

A. Remote Call Forwarding

Remote Call Forwarding ("RCF") provides a reasonable interim number portability solution. At least one major co-carrier apparently views RCF as *the* preferred interim solution.[3] When RCF is priced based on a per path rather than per number basis, and

[3] For example, Metropolitan Fiber Systems, Inc. ("MFS") has testified before the Public Utility Commission of Pennsylvania that it prefers RCF to Flexible Direct Inward Dialing because RCF utilizes more efficient trunking arrangements and is less complicated to implement. See Rebuttal Testimony of Gary J. Ball on behalf of MFS Intelenet of Pennsylvania, Inc., Case No. A-310203P0002, December 15, 1994. MFS refers to RCF as "Co-Carrier Call Forwarding."

rates adequately compensate the incumbent LEC for the actual usage of its network, plus a reasonable contribution, the service affords competitors fair access to and use of the incumbent provider's network while also ensuring fair compensation to the incumbent.[4]

In evaluating RCF, the Commission should be aware of the following inaccuracies or ambiguities in the facts as stated in the Notice:

- Ability to Support CLASS: Paragraph 58 of the NPRM states that RCF cannot support some custom local area signaling services (CLASS), and gives Caller ID as an example. This is incorrect, at least with respect to Bell Atlantic's network. Recent advances have made it possible for Bell Atlantic to offer Caller ID on calls ported via RCF. The correct telephone number will be displayed on the customer's Caller ID display unit, so

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[4] Tariffs that charge a monthly per path fee for RCF, plus usage, are essential to implement the principle that cost-causers who directly benefit from number portability should bear the associated costs. RCF must be charged per path if multiple simultaneous calls can be directed to the same forwarded number, thereby tying up network resources dedicated to each path. Usage charges are essential not only to compensate for usage-sensitive network capacity employed by the service, but also to offset any termination charges levied by the co-carrier on the forwarded call. Such tariffs will not have an adverse impact upon competition because they are cost-based and because co-carriers usually have much lower cost structures than the incumbent local exchange provider due to their much lesser investment in plant and personnel and to their ability to target selectively the most lucrative markets. On the other hand, requiring LECs to provide RCF at uneconomic rates would be highly punitive because it would require LECs to subsidize their competitors.

long as the co-carrier has modern digital switching equipment and common channel signalling. Furthermore, at least one co-carrier in Bell Atlantic's region has acknowledged that RCF has no adverse effect upon basic services such as Directory Assistance, Directory Listings or Call Detail Reporting.[5]

- Handling Capacity: Paragraph 58 of the NPRM states that RCF is capable of handling only a limited number of calls to customers of the same competing service provider at any one time. This is incorrect. There is no such limitation on RCF.[6]
- Access Fees: Paragraph 59 of the NPRM states that, because all terminating calls pass over the network of the incumbent local exchange carrier when RCF is used, the LEC always recovers interstate access charges from IXCs. This is true, but not a reason to reject RCF as an interim solution. Incumbents ***should*** receive interstate access fees for calls routed to their networks. The Commission also should be aware that competing local service carriers have claimed the right to ***impose local***

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[5] See Direct Testimony of Gary J. Ball on behalf of MFS Intelenet of Maryland, Inc., Case 8584, Phase II, before the Public Service Commission of Maryland, dated May 5, 1994, p. 47.

[6] There is a limitation on the number of simultaneous ***call paths*** on the same telephone ***number*** but that limitation is inconsequential.

termination charges on the incumbent LECs who port customer calls. These local termination charges are claimed to be compensation for terminating calls and are levied even if the call involved is local in origin and provides *no* access revenue to the incumbent LEC.

- Tandem Routing: Paragraph 61 of the NPRM states that RCF cannot utilize tandem switch routing. This is incorrect. Calls ported using RCF can be routed either end office to end office or via tandem, whichever is most efficient.

B. Flexible Direct Inward Dialing

Flexible Direct Inward Dialing ("Flex DID") was developed at the specific request of a competitive local exchange carrier ("CLEC"), but now apparently is in disfavor with at least some CLECs. Flex DID does, however, have the potential to ameliorate the problem of exhaustion of the numbering resource. Furthermore, contrary to the suggestion in the NPRM, Flex DID does not necessarily limit the number of calls that may be sent to customers of the same CLEC at any one time. Any limitation would occur only if the CLEC has made inadequate trunking arrangements.

C. Other Interim Number Portability Measures

The alternative measures identified at paragraphs 61 and 62 of the NPRM merit further study. However, it is noteworthy that the primary advantage which the NPRM claims for these alternatives

-- the ability to use tandem switch routing -- can also be attained through RCF.[7]

Efforts to develop additional interim measures should be voluntary. First, RCF, Flex DID or some combination of the two already provide a workable solution that allows CLECs to compete immediately and tests the proposition that number portability is actually important to significant numbers of customers. It would unduly burden LECs to require them to participate in development efforts towards any and all number portability measures that CLECs and others might be able to dream up. This is especially true in jurisdictions where the LEC already has negotiated or litigated one or more interim number portability arrangements.

III. The Commission Should Not Mandate Development and Implementation of Any Long-Term Number Portability Solution Absent Clear Proof that Benefits Exceed Costs

The Commission should not mandate development and implementation of any long-term number portability solution until such time as it is economically reasonable, technically feasible and the benefits derived exceed the costs involved. Some proposed solutions do not appear to meet all of the requirements for a viable long-term solution. Implementation of other more promising solutions would require significant network modifications and database development, involving significant investment, expense,

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[7] Another apparent advantage of the alternative measures, however, is that they appear to require use of only one telephone number.

dedication of resources, and time. Imposing the substantial costs of these solutions on carriers and consumers would be imprudent and against the public interest, absent clear and convincing evidence of widespread public demand for portability and that the absence of portability significantly impedes local competition.

The Commission should instead direct an appropriate industry task force to review comprehensively the possible technical solutions and report to the Commission whether there is industry consensus on a particular long-term solution that meets all service requirements. The task force should detail the network modifications, development work and time required to implement that solution. Further Commission proceedings at that time involving vendors, carriers, consumers and others could provide more accurate estimates of the costs of implementing the agreed industry solution, which would then be weighed against better data concerning demand for a long-term number portability solution. Those proceedings would provide an appropriate forum to determine cost recovery mechanisms that are tailored to the recommended technical solution.

A. A Uniform National Long-Term Number Portability Solution Is Required to Ensure National Network Interoperability

Deployment of different, and perhaps inconsistent, long-term number portability solutions across the country would harm

interstate telecommunications services.[8] At a minimum, certain uniform standards are required to ensure the continued interoperability of networks, such as a uniform addressing or routing scheme, a standard signaling method, and standard interfaces for any national database that may be required.

A national solution also would likely prove less costly if significant network modifications are required for implementation. Vendors can minimize development costs and expedite implementation schedules if they are seeking to meet a common set of requirements. Moreover, uniform national deployment requirements would generate increased volume for equipment orders, which in turn should permit vendors to lower prices.

Finally, because telephone number exhaustion is likely to be accelerated under certain number portability schemes, a national solution is more likely to promote conservation of these limited resources.

This does not mean, however, that the Commission should mandate a specific network architecture to implement any national solution. Each individual carrier should be given the flexibility to utilize whatever architecture or technology within its own network best enables that carrier to implement the national number portability solution. For example, some carriers may prefer to utilize advanced intelligent network, rather than intelligent

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[8] NPRM at ¶ 30.

network, capabilities for any required database query.[9] Similarly, some may prefer to launch database queries from a tandem switch rather than a central office switch. Others may wish to implement a "release to pivot" option for maximum network efficiency.[10] Such decisions should be left to the business judgment of the individual service provider.

Although any long-term number portability solution should be implemented on a uniform basis nationwide, the ***timing*** of that implementation should be determined by state regulatory authorities, to the extent feasible.[11] State authorities are in the best position to determine whether local competition among service providers or local consumer demand for location or service portability justifies implementation of the long-term solution in that state.

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[9] Bell Atlantic believes that advanced intelligent network capabilities will best support any national number portability solution ultimately adopted.

[10] "Release to pivot" uses the SS7 signaling network to "look ahead" to determine if a number has been ported, and to query the number portability database only if the number has been ported. Without the release to pivot capability, it might be necessary to do a database query on all calls within a portable NXX code area, even if only one of the ten thousand numbers in that area has actually been ported.

[11] Certain solutions, of course, may require simultaneous nationwide implementation to work effectively. For example, any solution that requires the originating carrier to launch a number portability database query for every call would only work if all carriers were capable of launching that query.

B. Presently Proposed Long-Term Portability Solutions Have Serious Shortcomings or Would Be Costly and Difficult to Implement

Any true long-term number portability solution must meet several requirements in order to maintain service quality, ensure competitive neutrality, and prevent inefficient and wasteful use of network and numbering resources. It should:

- Be capable of supporting all three types of number portability (service provider, geographic and service portability);
- Permit delivery of any existing service, including enhanced 911, operator (e.g., busy line verification, collect and calling card calls), CLASS (e.g., caller ID, automatic callback and automatic recall), and call forwarding services;
- Utilize only one numbering resource per line;
- Not result in increased post-dialing delay or other service degradation;
- Maintain efficient, unambiguous routing of calls within the public switched telephone network;
- Give each carrier flexibility to select the particular technologies, platforms and call processing scenarios best suited to enable it to comply with any national solution in the most cost effective and efficient manner;
- Be reciprocal, so that migration from and to incumbent local exchange carriers is handled in the same manner, and is competitively neutral in its effects;
- Be cost effective, add to consumer welfare and allow development and provisioning costs to be fairly recovered; and
- Permit full compliance with the requirements of the Communications Assistance for Law Enforcement Act of 1994 concerning electronic surveillance capabilities.

As the Commission noted, the Industry Numbering Committee ("INC") recently released a draft report that summarizes the

essential elements of any potential long-term number portability solution and identifies the various technical proposals to date.[12]

The MCI Metro proposal[13] suffers from numerous defects that render it unacceptable as a national solution. First, because this architecture routes calls to ported numbers by substituting a three-digit "carrier portability code" ("CPC") for the dialed number NPA (allocated from the unassigned pool of NPAs), it accelerates number exhaust and the need to expand the North American Numbering Plan. Second, this architecture introduces inefficient routing ambiguities because substituting the CPC for the dialed number NPA eliminates the network's ability to identify the switch to which the number is ported. These routing ambiguities could further increase call set-up times.[14] Third, it appears that at least some existing operator services, such as busy line verification, could be impaired. That is because the CPC routing and addressing scheme does not uniquely identify the terminating switch in cases where an NXX code resides in multiple switches within a carrier's network. As a result, operators that are requested to perform busy line verification on a ported number may not be able to identify the switch serving the ported number.

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[12] NPRM at ¶ 16.

[13] ***See id.*** at ¶ 36.

[14] Increasing call setup times increases the holding times of switch resources allocated during call setup. This in turn can affect switch capacity, eventually triggering the need for switch upgrades or replacements.

Finally, contrary to the NPRM,[15] the MCI solution does not and will not support location portability.

The GTE proposal simply to assign new 700 numbers, on a one-time basis, to those customers who wish to port their numbers may be a useful interim solution, but directly conflicts with the fundamental goal of number portability. That goal is to permit consumers to switch service providers, geographic locations and services ***without*** having to change their telephone number.

The other solutions identified by INC hold greater promise. Based on preliminary analyses, it appears that both the AT&T and U.S. Intelco solutions would effectively use only one telephone numbering resource to route calls to ported numbers, would not impair existing services, would provide unambiguous and efficient call routing, and could meet the other essential requirements outlined above. But both would require ***extensive*** hardware and software modifications in the public switched network, including switch development, new SS7 standards, enhanced billing capabilities, new or enhanced operation support system interfaces, and new database query capabilities. No accurate estimate of the cost of such development and implementation work can be made until the specifications for the network modifications required to support the recommended solution are clearly defined and vendor bids obtained. It is clear, however, from the scope of the changes

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[15] NPRM at ¶ 36.

required, which affect virtually every part of the existing public switched telephone network, that such costs would be significant.

The AT&T solution has one additional identifiable shortcoming: it restricts location portability only to rate center areas. Such limited location portability would place incumbent local exchange carriers at a competitive disadvantage to other service providers who may cover a much larger geographic area with a single switch. Unless Federal and state regulatory authorities were to restrict location portability by all service providers to rate center areas under a national AT&T type number portability method, the U.S. Intelco approach would appear to support competitive neutrality more effectively.

In short, current proposed technical solutions to provide true long-term number portability do not appear to be available at reasonable cost or to be capable of being easily implemented. It would therefore be premature for the Commission to mandate implementation of any particular uniform national long-term solution at this time.

C. Any Long-Term Solution Should Ensure That the Benefits to Consumer Welfare Clearly Exceed the Costs of Implementation

As the Commission has acknowledged, it lacks sufficient information to be able to compare the relative costs and benefits associated with the current interim number portability solutions to

the costs and benefits of long-term solutions.[16] As the industry gains experience with the interim solutions now in use, empirical data on the costs and benefits of those solutions will be generated. Gaining such data on hypothetical long-term solutions is much more problematic.

With regard to costs, it would be extremely difficult to come up with even a ballpark estimate of the costs of implementing a long-term solution that is likely to be accurate, absent agreement on:

- The particular solution and the specific network modifications required to implement it;
- The specifications for those network modifications; and
- Vendor input concerning the cost and timetable for development and provisioning of the required hardware and software modifications.

Such cost information simply is not available today.

With regard to benefits, there is no clear empirical evidence that substantial consumer (as opposed to service provider) demand for number portability exists. Moreover, the studies cited by the Commission or that are otherwise publicly available come to contradictory conclusions as to whether the availability of number portability would affect local competition to any significant extent.

On the one hand, studies commissioned by competing local service providers suggest that significant numbers of customers are

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[16] NPRM at ¶ 68.

unlikely to switch providers to obtain comparable or better service or prices if they would have to change their telephone numbers.[17] A study commissioned by a local exchange carrier, in contrast, shows that although most customers will express a preference for keeping their existing telephone number, that concern is "far less significant when all elements of deciding to switch local service providers are evaluated simultaneously." In fact, that study shows that a pricing discount of only 11-12% is sufficient to overcome consumer reluctance to switch telephone numbers.[18]

As the Commission has noted, any "disincentive[] to change service providers may [also] be mitigated...if a significant number of customers change their telephone numbers for other reasons."[19] There, too, the evidence is in conflict, with one incumbent local exchange carrier showing that 25% of its customers change their numbers each year for non-competitive reasons, and one

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[17] *Id.* at ¶ 22 & n.26.

[18] ConStat, Inc., "Analysis of Potential Local Access Competition and Interconnection Issues: Business Market," Final Report at 17 (May 1995) (prepared for Pacific Bell); Constat, Inc., "Analysis of Potential Local Access Competition and Interconnection Issues: Residence Market," Final Report at 15 (May 1995) (prepared for Pacific Bell).

[19] NPRM at ¶ 22. Of course, implementation of a significant number of new NPAs nationwide in the coming months will require many consumers to change their telephone numbers, eliminating any disincentive to change service providers at that time.

long distance carrier showing that only half as many of its residential customers do so.[20]

It is difficult to assess and compare the results of these disparate studies in a meaningful way, because they were conducted by various entities at different times using different methodologies. It is also unclear whether customers answering these surveys had all of the appropriate data they needed to provide accurate responses. As discussed above, all of the currently proposed long-term number portability solutions would require substantial network modifications at significant cost. Yet there is no evidence to show how much rates for telecommunications services would have to be increased to pay for that solution. Nor is there evidence that consumers would be willing to pay those rates; to the contrary, what evidence exists shows instead that with modest pricing discounts, consumers are willing to change their numbers.[21]

The Commission therefore must not merely assume that implementation of a long-term number portability solution would increase consumer welfare. Any decision to require such implementation must be based on reliable, empirical evidence irrefutably demonstrating that there is strong consumer demand for

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[20] NPRM at ¶ 23.

[21] It is instructive to note that in the United Kingdom, cable companies were able to compete effectively with the incumbent telephone company in signing up new residential customers despite the absence of long-term number portability solutions.

such portability and that consumers are willing to pay higher rates for their telephone services in order to cover the costs of developing and implementing that capability.

D. Further Industry Work is Required to Determine if Any Current Number Portability Proposal Would Provide a Cost Effective Long-Term Solution

Given the multitude of uncertainties concerning the desirability, technical feasibility and cost of any long-term number portability solution, the Commission should refer these issues to a newly created industry task force. INC has done a superb job addressing this issue to date by identifying all existing technical proposals for further consideration. But with the many issues that fall within its jurisdiction and the limited time it can devote to each, INC is unlikely to be the best forum in which to compare the advantages and limitations of each of the various proposed solutions in order to recommend one for implementation, if appropriate.

Bell Atlantic therefore urges the Commission not to take any further action on its proposed rulemaking at this time, but to instead refer these issues to a special industry task force under the auspices of ATIS, composed of subject matter experts representing all affected constituencies, for a more detailed examination of the issues raised in the Commission's Notice. The task force should be charged with three responsibilities: collecting and evaluating all relevant data concerning the efficacy and cost of existing interim solutions, identifying the best long-

term number portability solution, and cataloging all of the network and operation support system modifications, including hardware and software development, required to implement that solution. Such a group, with this issue as its single focus and with concerted effort, should be able to provide the Commission with its recommendations within a reasonable period, perhaps 18 months.

The Commission could then share the proposed solution with various equipment vendors, and obtain their input concerning the likely cost of developing and provisioning the recommended long-term solution.[22] In the meantime, the Commission and the industry could collect additional data on the existence and strength of consumer (as opposed to service provider) demand for a long-term number portability solution.[23] At that point, the Commission would have sufficient empirical, technical and cost data to obtain meaningful industry comments on the issues raised by the current Notice (including the appropriate methods for recovering the costs of any long-term solution implemented). The industry,

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[22] This is precisely the model the Commission followed in working with the cable television industry to create the new Emergency Alerting System requirements. ***Amendment of Part 73 of the Commission's Rules Regarding the Emergency Broadcast System***, Report and Order and Further Notice of Proposed Rulemaking, 10 FCC Rcd 1786 at ¶¶ 50-65 (1994).

[23] While the task force effort is underway, the Commission should consider conducting its own balanced and statistically valid survey of existing and anticipated consumer demand for number portability.

like the Commission, simply lacks the data to be able to answer those questions today.

E. Cost Recovery Issues Should Be Deferred to a Later Proceeding

The appropriate cost recovery mechanism will depend in part on the particular long-term solution to be implemented and should therefore be examined in detail at a later date when agreement has been reached on a uniform proposed solution. The fundamental principle that should guide the Commission's consideration of this issue, however, is to ensure that the costs are equitably recovered from all of the "cost-causers" -- those who require and benefit from number portability. That would include consumers who port their numbers and the carriers who provide service to those consumers. In addition, the Commission must ensure that any rules it may ultimately adopt concerning the selection, provisioning and recovery of costs for any number portability solution has a strictly neutral competitive effect.

F. The Commission Should Encourage Voluntary Industry Efforts to Develop and Assess Number Portability Solutions

While the industry task force pursues a further investigation of these issues, the Commission should encourage the industry, in cooperation with state regulatory authorities, to pursue ***voluntary*** efforts to develop and assess both interim and long-term number portability solutions, and to share any useful information with the task force.

Several states, however, are requiring industry participation in state-mandated trials and other efforts to identify and implement local number portability solutions. Such efforts to develop and implement state specific solutions may ultimately conflict with the goal of identifying and implementing a uniform national solution. Such efforts may also be redundant of work taking place elsewhere, unnecessarily and inefficiently imposing additional costs that must eventually be borne by consumers through higher telephone rates. The Commission should monitor state proceedings and take appropriate action if state-mandated efforts would conflict with the Commission's discharge of its obligations.[24]

IV. Development of Number Portability Measures for Non-Geographic Telephone Numbers Would Require Substantial Expense and is Premature

The development of service provider portability for 900 and 500 numbers is premature. First, it is, at best, speculative whether demand for 900 and 500 services is sufficient to ensure that the substantial expense that would be required to develop service provider portability could ever be recovered, consistent

[24] For example, state-mandated implementation of the MCI proposed solution could significantly accelerate exhaustion of numbering resources under the North American Numbering Plan.

with the principle that cost-causers should bear the expense.[25] Non-geographic number portability should not be addressed by the Commission until more significant demand for these services, especially 500 service, has crystallized.[26]

Second, non-geographic number portability would require extensive planning and development. It is somewhat naive to assume that the 800 database could simply be upgraded to accommodate 900 and 500 numbers. While this may be feasible, numerous changes would have to be made to the 800 database's logic and capacity, record validation system, record format, system interfaces, and administration guidelines to account for the differences in 800, 900 and 500 service. Extensive system rework would be required to bring these changes to fruition, a task that would neither be quick nor inexpensive.

Should the Commission nonetheless take the view that developmental efforts towards portability for non-geographic numbers, such as 900 and 500, is warranted, a separate docket should be established to examine the unique issues that would be

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[25] Nothing in the INC report on PCS number portability alters the considerations stated in the text above. As a participant in the development of the PCS N00 Portability Report, Bell Atlantic emphasizes that a great many of the elements that would be required for PCS portability simply are not yet developed or available.

[26] Although Bell Atlantic previously advocated 500 number portability, ***see*** Comments of Bell Atlantic, ***Assignment of Service Access Codes for Personal Communications Services***, IAD File No. 93-01 (filed Sept. 7, 1993), in light of the minimal demand to date for 500 service, Bell Atlantic no longer believes that it would be prudent to pursue 500 number portability at this time.